

1 **MARGO A. RAISON, KERN COUNTY COUNSEL**
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8 **Attorneys for Defendant Kern County Sheriff's Office,**
9 **Thomas Craig and Miguel Orozco**

10 **UNITED STATES DISTRICT COURT**

11 **EASTERN DISTRICT OF CALIFORNIA**

12 **JANE DOE,**) CASE NO.: 1:20-CV-01544-BAK (EPG)
13 vs.)
14 **KERN COUNTY SHERIFF'S OFFICE,**)
15 **THOMAS CRAIG, MIGUEL OROZCO,**)
16 **DOES 2-20,**)
17 **Defendants.**)

18 This stipulation is entered into by and between plaintiff Jane Doe and defendants County of
19 Kern, Thomas Craig, and Miguel Orozco, by and through their respective counsel to modify the
20 Scheduling Order in this matter.

- 21 1. The Court has granted only one prior extension to the discovery deadlines.
- 22 2. Pursuant to the Scheduling Order, the deadline for the exchange of expert disclosures
23 is set for April 12, 2022. As set forth in the attached declarations, the parties unlikely to be able
24 comply with the scheduled dates in this matter despite their diligence and therefore request a short
25 extension to the expert discovery deadlines.
- 26 3. Although the parties have cooperated in discovery and have met and conferred on
27 several occasions, discovery has run longer than expected. The County of Kern's expert, Dr. Praveen
28 Kambam, has completed the mental health examination of Plaintiff. However, the Parties agree that

1 due to the large quantity of Plaintiff's medical records and treatment, there is good cause for a short,
2 seven (7) day extension to the discovery cutoff date.

3 5. Based on the forgoing, the parties agree through counsel to amend the scheduling
4 order as follows:

5 Deadline:	Currently:	Proposed:
6 Non-expert Discovery Cutoff:	03/30/22	03/30/22
7 Expert Disclosure:	04/12/22	04/19/22
8 Rebuttal Expert Disclosure:	05/10/22	05/17/22
9 Expert Discovery Cutoff:	06/13/22	06/20/22
10 Dispositive Motion Filing Deadline:	06/22/22	06/22/22
11 Pre-Trial Conference:	09/06/22	09/06/22
12 Trial:	10/17/22	10/17/22

13 NOW THEREFORE, IT IS HEREBY STIPULATED by the Parties that the Scheduling
14 Order be modified as set forth above.

15 Dated: April 8, 2022

LAW OFFICE OF PHILLIP GANONG
By: /s/ Phillip Ganong*
Phillip Ganong, Esq.
Attorney for Plaintiff, Jane Doe

16 Dated: April 8, 2022

MARGO A. RAISON, COUNTY COUNSEL

17 By: /s/ Andrew C. Hamilton

Andrew C. Hamilton, Deputy
Attorneys for Defendants,
County of Kern, Thomas Craig and Miguel Orozco

22 *With permission on 4/8/2022

ORDER

THE COURT, HAVING FOUND GOOD CAUSE, AND PER STIPULATION OF COUNSEL, IT IS HEREBY ORDERED that the Scheduling Order be Amended as follows:

Deadline:	Currently:	Proposed:
Non-expert Discovery Cutoff:	03/30/22	03/30/22
Expert Disclosure:	04/12/22	04/19/22
Rebuttal Expert Disclosure:	05/10/22	05/17/22
Expert Discovery Cutoff:	06/13/22	06/20/22
Dispositive Motion Filing Deadline:	06/22/22	06/22/22
Pre-Trial Conference:	09/06/22	09/06/22
Trial:	10/17/22	10/17/22

IT IS SO ORDERED.

Dated: April 8, 2022

/S/ Eric P. Groj

DECLARATION OF ANDREW C. HAMILTON

I, ANDREW C. HAMILTON, declare as follows:

1. I am a Deputy County Counsel in the Office of County Counsel for the County of Kern and I am the attorney assigned to this matter for the County of Kern. I am licensed to practice law before all of the state and federal courts within the State of California. I am thoroughly familiar with the facts as contained in this Declaration, and if called upon as a witness, I could and would competently testify to the matters set forth herein.

2. Pursuant to the Scheduling Order, the deadline for the exchange of expert disclosures is set for April 12, 2022. As set forth in the attached declarations, the parties unlikely to be able comply with the scheduled dates in this matter despite their diligence and therefore request a short extension to the expert discovery deadlines.

3. Although the parties have cooperated in discovery and have met and conferred on several occasions, discovery has run longer than expected. The County of Kern's expert, Dr. Praveen Kambam, has completed the mental health examination of Plaintiff. However, the Parties have met and conferred and agree that due to the large quantity of Plaintiff's medical records and treatment, there is good cause for a short, seven (7) day extension to the discovery cutoff date.

4. The Court has granted only one prior extension to the discovery cutoff. The County has a pending motion with the Court to also extend the deadline to depose Justin McGee.

I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed this 8th day of April, 2022, in Bakersfield, California.

/s/ Andrew C. Hamilton

Andrew C. Hamilton, Deputy